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of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF APPEAL AND STATEMENT  
OF ELECTION TO HAVE APPEAL  
HEARD BY DISTRICT COURT**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

1           **NOTICE IS HEREBY GIVEN** that the Official Committee of Unsecured Creditors (the  
2   “Creditors’ Committee”) appointed in the above-captioned chapter 11 cases, by its attorneys  
3   Milbank LLP, hereby seeks to preserve its ability to participate in any appeal from (i) the  
4   *Interlocutory Order Regarding Postpetition Interest* [Docket No. 5669] (the “PPI Order”), entered  
5   on February 6, 2020, and (ii) the related *Memorandum Decision Regarding Postpetition Interest*  
6   [Docket No. 5226] (the “PPI Memorandum”), entered on December 30, 2019. Copies of the PPI  
7   Order and PPI Memorandum (the “PPI Orders”) are attached hereto as **Exhibit A** and **Exhibit B**,  
8   respectively. Pursuant to 28 U.S.C. § 158(c)(1), should an appeal be taken from the PPI Orders,  
9   the Creditors’ Committee hereby elects to have the appeal heard by the United States District Court  
10   for the Northern District of California (the “District Court”) rather than by the Bankruptcy  
11   Appellate Panel for the Ninth Circuit.

12           On February 20, 2020, the Ad Hoc Committee of Holders of Trade Claims noticed its  
13   appeal from the PPI Order [Docket No. 5844].<sup>1</sup> Any immediate appeal of the PPI Order could  
14   have far-reaching impact on the economics of the *Debtors’ and Shareholder Proponents’ Joint*  
15   *Chapter 11 Plan of Reorganization Dated January 31, 2020* [Docket No. 5590], as well as on the  
16   voting rights and recoveries of creditors that compose the Creditors’ Committee’s constituency.  
17   Thus, while the Creditors’ Committee is not seeking to prosecute an appeal of the PPI Orders as a  
18   sole appellant at this time, to the extent that the District Court hears an appeal from the PPI Orders,  
19   the Creditors’ Committee submits that it must be permitted to participate in that appeal.

20           The names of all parties to the PPI Orders other than the Creditors’ Committee, and the  
21   names, addresses, and telephone numbers of their respective attorneys are:

Party	Counsel
Debtors	WEIL, GOTSHAL & MANGES LLP Stephen Karotkin ( <i>pro hac vice</i> ) Ray C. Schrock, P.C. ( <i>pro hac vice</i> ) Jessica Liou ( <i>pro hac vice</i> ) Theodore E. Tsekerides ( <i>pro hac vice</i> ) 767 Fifth Avenue New York, NY 10153-0119 Telephone: (212) 310-8000

28   <sup>1</sup> The Creditors’ Committee is permitted to file this notice of appeal within 14 days after the Ad Hoc Committee of Holders of Trade Claims noticed its appeal from the PPI Order. *See* Fed. R. Bankr. P. 8002(a)(3).

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DATED: March 5, 2020

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